

BOULT
CUMMINGS
CONNERS
& BERRY
PLC

REC'D TN
REGULATORY AUTH.

LAW OFFICES
414 UNION STREET, SUITE 1600
POST OFFICE BOX 198062
NASHVILLE, TENNESSEE 37219

99 APR 22 PM 4 16

Henry Walker
(615) 252-2363
Fax: (615) 252-6363
Email: hwalker@bccb.com

OFFICE OF THE
EXECUTIVE SECRETARY
TELEPHONE (615) 244-2582
FACSIMILE (615) 252-2380
INTERNET WEB <http://www.bccb.com/>

April 22, 1999

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Dialing Parity Plan for ICG

99-00291

Dear David:

Enclosed is an intraLATA dialing parity plan for ICG Telecom Group, Inc.

If you have any questions, please feel free to call me.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/lw
Enclosure

**Application of ICG Telecom Group, Inc.
for Approval of IntraLATA Equal Access Implementation Plan
Pursuant to FCC Order 99-54**

IntraLATA Equal Access Implementation Plan

April 22, 1999

ICG Telecom Group, Inc.
IntraLATA Equal Access Implementation Plan

I. OBJECTIVE/PURPOSE

In compliance with Federal Communications Commission Order 99-54, ICG Telecom Group, Inc. ("ICG" or "the Company") files the Company's plan for implementing intraLATA Equal Access ("the Plan") in the areas of the state of Tennessee in which the company is certified to provide local exchange service.

The intent of the Plan is to permit customers to route intraLATA toll calls automatically, without the use of access codes, to any interexchange carrier ("IXC") of the customer's choice.

II. IMPLEMENTATION SCHEDULE

ICG will offer dialing parity for intraLATA toll calls 30 days after Tennessee Regulatory Authority approval of this implementation plan. At that time, ICG's retail customers may choose any participating IXC.

III. CARRIER SELECTION PROCEDURES

ICG will implement full 2-PIC carrier selection methodology. With the full 2-PIC methodology, customers will be able to pre-subscribe to one telecommunications carrier for interLATA toll calls and to pre-subscribe to the same or a different participating telecommunications carrier for intraLATA toll calls.

Processes will be established to provide new customers with an opportunity to choose their intraLATA toll carrier. Company employees who communicate with the public, accept orders and serve in customer service capacities will be trained to explain to customers the availability of

2-PIC equal access, and to assist customers in making an initial PIC choice or in changing a PIC choice for intraLATA and interLATA toll calls.

IV. CARRIER NOTIFICATION

Current interexchange carriers will be notified of intraLATA equal access implementation by letter in advance of the proposed implementation date. Carriers will be asked to provide a list of exchanges in which they plan to offer intraLATA toll service. The advance notification is necessary to include the carrier on the list of participating intraLATA toll carriers in each ICG serving area. IntraLATA toll carriers who enter the market after implementation will be added to the list of participating intraLATA toll carriers within 30 days of notifying ICG.

V. NEW CUSTOMERS

A customer who contacts ICG requesting new telephone exchange service will be informed of the opportunity to choose both an intraLATA and interLATA PIC. If requested by the customer, ICG will provide a list of participating telecommunications carriers. A new customer who does not make a positive choice for an intraLATA toll carrier will be identified within ICG's system as "no-PIC" and will not be automatically defaulted to a carrier. A new customer identified as "no-PIC" within ICG's system will be required to dial the access code of a different carrier to place intraLATA toll calls until the customer makes an affirmative choice for an intraLATA toll carrier.

VI. EXISTING CUSTOMERS

On the date in which intraLATA toll pre-subscription is available, ICG's customers will be notified that they may pre-subscribe to ICG or any participating telecommunications carrier

offering interexchange service. An existing customer who does not make a choice for an intraLATA PIC when intraLATA equal access becomes available will default to ICG for intraLATA 1+ and 0+ toll calls. Attached is a sample notification letter to an existing customer.

VII. INITIAL PIC REQUEST

A customer's initial PIC request, made prior to, or within six (6) months after, implementation of intraLATA equal access, will be made at no charge. After the initial six month period, ICG will bill a customer a PIC change charge at a rate no greater than the rate for the selection of an interLATA PIC.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Henry Walker", is written over a horizontal line.

Henry Walker
Counsel for ICG Telecom Group, Inc.
Boult, Cummings, Conners & Berry
414 Union Street, Suite 1600
Nashville, Tennessee 73034

Date

John Q. Sample
Sample Company
123 Main Street
Anytown, USA 12345

Dear Customer:

The purpose of this letter is to inform you that you may now select a company different than your local service provider to carry the 1+ long distance calls made within your calling area or LATA (a LATA is a local transport area indicated by your area code).

Beginning (implementation date), you may choose the company you wish to carry these long distance intra-LATA calls. In the coming months, companies that plan to offer this service within your calling area may begin contacting you through telemarketing, advertising or direct mail campaigns. The information they provide may help you make your choice since each company's rates, plans and policies differ.

If you elect to choose one of these providers, call the business office of the company you have selected. If you choose not to elect a specific provider, ICG Telecom Group will provide your 1+ long distance service within your LATA. All changes in providers will become effective (implementation date).

Changes you may choose to make for this specific long distance service will not impact the current local service provider you have chosen nor the long distance company you utilize for long distance calls outside the State or between calling areas. In addition, changes will have no effect on the size or the geographic areas covered by your current LATA.

If you have any questions, please contact your ICG Telecom Group sales representative or call our National Customer CARE Center at 1-888-424-4440.

Sincerely,

Jerrold Dillahunt
Director, Customer Care West